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Attorneys for Defendants *Marwan Shipping
& Trading, Five Seas Shipping Co., LLC,
and Al-Buhaira National Insurance Co.*

FILED

DISTRICT COURT OF GUAM

MAR - 6 2007 *mbc*

MARY L.M. MORAN
CLERK OF COURT

UNITED STATES DISTRICT COURT
DISTRICT OF GUAM

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARWAN SHIPPING & TRADING CO.,
FIVE SEAS SHIPPING CO., LLC AND S.J.
GARGRAVE SYNDICATE 2724, IN
PERSONAM, NAVIGATORS PROTECTION
& INDEMNITY, AND AL-BUHAIRA
NATIONAL INSURANCE COMPANY,

Defendants

AND CROSS-CLAIMS, COUNTERCLAIMS,
THIRD-PARTY COMPLAINT, AND CLAIM
IN INTERVENTION.

NO. CIV06-00011

**MARWAN SHIPPING AND TRADING
CO. AND FIVE SEAS SHIPPING CO,
LLC'S OPPOSITION TO GARGRAVE
SYNDICATE 2724'S MOTION TO
DISMISS CROSS-CLAIM OR
ALTERNATIVELY TO STAY THE
CROSS-CLAIM**

Accompanying Documents: Memorandum of
Points and Authorities; Declaration of John E.D.
Powell; Table of Foreign Authorities; Proposed
Order

Complaint Date: April 19, 2006

Trial Date: Not set

Defendants and Cross-claimants Marwan Shipping & Trading Company and Five Seas
Shipping Company, LLC (collectively, "Marwan") hereby oppose Defendant and Cross-claimant
Gargrave Syndicate 2724's motion for an order to dismiss, or in the alternative to stay, Marwan's

MARWAN AND FIVE SEAS' OPPOSITION TO
MOTION TO DISMISS

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1 cross-claims against it. Marwan's opposition is supported by this Opposition, the accompanying
2 Memorandum of Points and Authorities, the Affidavit of John E.D. Powell, including the
3 exhibits appended thereto, and the pleadings, records and files of this Court.

4 DATED this 6th day of March, 2007.

5 **CAIRNCROSS & HEMPELMANN, PS**

6 **TEKER TORRES & TEKER, P.C.**

7
8
9 By 

10 **LAWRENCE J. TEKER, ESQ.,**

11 Attorneys for Defendants, **Marwan Shipping &**
12 **Trading Co., Sharjah, Five Seas Shipping Co.,**
13 **LLC, Sharjah, and Al-Buhaira National**
14 **Insurance Co.**

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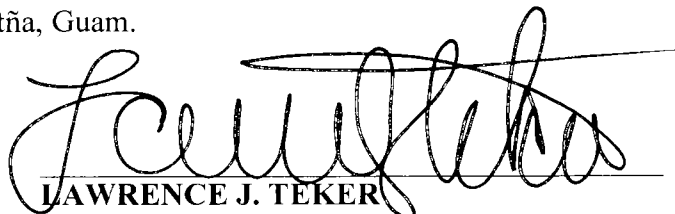
CERTIFICATE OF SERVICE

The undersigned certifies under the penalty of perjury according to the laws of the United States and the State of Washington that on this date I caused to be served in the manner noted below a copy of this document entitled **MARWAN SHIPPING AND TRADING CO. AND FIVE SEAS SHIPPING CO, LLC'S OPPOSITION TO GARGRAVE SYNDICATE 2724'S MOTION TO DISMISS CROSS-CLAIM OR ALTERNATIVELY TO STAY THE CROSS-CLAIM** on the following individuals:

R. Michael Underhill, Mimi Moon Torts Branch, Civil Division US Department of Justice 450 Golden Gate Avenue, Room 7-5395 PO Box 36028 San Francisco, CA 94102-3463	Forrest Booth Ryan Donlon Severson & Werson One Embarcadero Center, 26 th Floor San Francisco, CA 94111
David Ledger Carlsmith Ball LLP Bank of Hawaii Building, Suite 401 134 West Soledad Avenue PO Box BF Hagåtña, Guam 96932-5027	Thomas M. Tarpley Jr. Tarpley & Moroni LLP Bank of Hawaii Building 134 West Soledad Ave., Suite 402 Hagåtña, Guam 96910
Office of the United States Attorney 108 Hernan Cortez Avenue, Suite 500 Hagåtña, Guam 96910	

- ☐ Via First Class Mail
☒ Via Messenger
☒ Via E-mail

DATED this 6th day of March, 2007, in Hagåtña, Guam.


LAWRENCE J. TEKER

MARWAN AND FIVE SEAS' OPPOSITION TO
MOTION TO DISMISS

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